

REMARKS

This application has been reviewed in light of the Office Action dated February 24, 2006. Claims 1, 4-6, 11, 14-18 and 25 are presented for examination, of which Claims 1, 4, 11, and 25 are in independent form. Claims 2, 8-10, 12, 20-24 and 26 have been canceled, without prejudice or disclaimer of subject matter, and will not be mentioned further. Claims 1, 4, 8, 11, 14, 18 and 25 have been amended to define still more clearly what Applicants regard as their invention.

Initially, Applicants' attorneys note that, pursuant to a telephone discussion with the Examiner, Applicants understand that an initialed copy of the form PTO-1449 that was filed with the Information Disclosure Statement dated January 4, 2002, and a form PTO-892 making U.S. Patent 6,616,257 (Imanaka) of record, will be attached to the Examiner's next paper.

Also, Applicants understand, based on the mentioned telephone discussion, that the only issue remaining outstanding under Section 112 is that relating to the calculation of the amount P of the higher-printability colorant. Since the claims which contained the relevant recitation have been canceled, this rejection is believed to be moot.

Claims 1, 4, 5, 11, 14, 15 and 25 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent 5,917,994 (Perumal et al.). In addition, Claims 6 and 18 were rejected under 35 U.S.C. § 103(a) as being obvious from *Perumal* in view of U.S. Patent 5,882,390 (Nagai et al.), and Claims 16 and 17, as being obvious from *Perumal* in view of U.S. Patent 6,616,257 (Imanaka).

The background and general nature of the present invention have been adequately discussed previously, and it is not believed to be necessary to repeat that discussion in full.

Independent Claim 1 is directed to an image processing method of generating print data for a plurality of different color materials to be used by a printer. That method comprises steps of generating print data for blue, and of using that print data to replace, at least partially, certain portions of the original print data. More specifically, the print data of blue is generated by using print data of cyan and magenta from among the plurality of colors of print data. Then, there is generated processed print data, in which original print data of cyan and magenta is replaced at least partially with the print data of blue. According to Claim 1, the color material for generating the print data of blue has a higher lightness than do the color materials for generating the print data of cyan and magenta.

Thus, among other notable features of the method of Claim 1, in addition to the at least partial replacement of at least some of the print data of cyan and magenta with a secondary color ink (specifically, blue), is the feature that the color material of the latter ink has a higher lightness than do the color materials used for printing the print data of cyan and magenta.

Even if the *Perumal* system performs CV (color-vector) conversion on RGB data to convert the latter into KCMYRGBW data (FIG. 2), nothing in that patent is seen to teach or suggest the feature recited in Claim 1 that “the color material for generating the print data of blue has a higher lightness than do the color materials for generating the print data of cyan and magenta”. That is, in the method of Claim 1, magenta and cyan, which influence the granularity, are replaced with blue (lines 9-12 of page 18), and the print lightness of blue is made higher than the print lightness of cyan or magenta to achieve further suppression of the granularity (lines 19-22 of page 17). By virtue of these features of the method of Claim 1, it is possible to reduce the granularity by (1) applying blue, and

(2) making the print lightness of blue higher than that of cyan or magenta, thereby achieving high image quality. Nothing in *Perumal* is believed to provide this benefit, or to suggest the quoted feature of the method of Claim 1.

For at least that reason, Claim 1 is believed to be allowable over *Perumal*.

Independent Claims 11 and 25 are apparatus and computer memory medium claims, respectively, corresponding to method Claim 1, and are believed to be patentable for at least the same reasons as discussed above in connection with Claim 1.

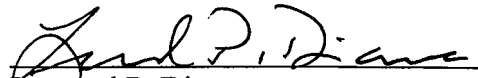
A review of the other art of record has failed to reveal anything which, in Applicants' opinion, would remedy the deficiencies of the art discussed above, as a reference against the independent claims herein. Those claims are therefore believed patentable over the art of record.

The other claims in this application are each dependent from one or the other of independent Claims 1 and 11, and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and allowance of the present application.

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Leonard P. Diana", is written over a horizontal line.

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